

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Jane Doe 1, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

JPMorgan Chase Bank, N.A.,

Defendant.

Case No. 1:22-CV-10019 (JSR)

**REPLY DECLARATION OF DAVID BOIES IN FURTHER SUPPORT OF
PLAINTIFF JANE DOE 1'S MOTION FOR CLASS CERTIFICATION**

I, David Boies, declare as follows:

1. I am a member in good standing of the bar of the State of New York and am admitted to practice before this Court. I am the Chairman and a Managing Partner of Boies Schiller Flexner ("BSF"). I make this declaration on my own personal knowledge, and if called as a witness to testify, I could and would testify competently to the following facts.

2. I submit this declaration in further support of the motion filed by Jane Doe 1 for class certification and approval of BSF as Class Counsel.

3. Attached hereto as **Exhibit 46** is a true and correct copy of excerpts of the April 27, 2023, deposition of Kimberly Mehlman-Orozco, designated confidential by JPMC pursuant to the Protective Order in this matter and filed under seal.

4. Attached hereto as **Exhibit 47** is a true and correct copy of excerpts of the March 3, 2023, deposition of Plaintiff Jane Doe 1, designated confidential pursuant to the Protective Order in this matter and filed under seal.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 19, 2023

Respectfully Submitted,

By: /s/ David Boies

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